

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KEIANA GRATE, individually,

Plaintiff,

v.

JOSEPH CODY BROWN, an individual;
XCMNV, LLC d/b/a ACE RENT-A-CAR,
a Domestic Limited-Liability Company
DOE DRIVERS I-V, DOE OWNERS I-V,
ROE EMPLOYER and ROE
COMPANIES,

Defendants.

Case No. 2:24-cv-00459-JAD-NJK

Stipulation and Order

(First Request)

Following the United States' removal of this case from Nevada state court and the United States' substitution as the defendant in place of Joseph Cody Brown by operation of law under 28 U.S.C. § 2679(d)(2), the parties hereby stipulate to extend the time for the United States to file an Answer or otherwise respond to Plaintiff's Complaint to April 8, 2024, which is 30 days after the filing of the Petition for the removal of this case from state court (ECF No. 1).

This extension will allow undersigned counsel adequate time to receive and review any file materials or information from the client agency, the United States Air Force.

Undersigned defense counsel has consulted with Plaintiff's counsel, Mr. Duran, who advises that he does not object to the request for extension requested herein.

For the above reasons, Defendant United States respectfully requests this extension of time, to April 8, 2024, to file an Answer or otherwise respond to Plaintiff's Complaint.

This stipulated request is filed in good faith and not for the purposes of undue delay.

Respectfully submitted this 8th day of March 2024.

VAN LAW FIRM

JASON M. FRIERSON
United States Attorney

/s/ Noah A. Duran
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/s/ R. Thomas Colonna
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: March 11, 2024